## IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

MARK BUTTERLINE :

Plaintiff :

:

v. :

NO. 15-01429

CITY OF PHILADELPHIA :

Defendant :

## JOINT MOTION TO CONTINUE DEADLINES OR STAY

- On December 13, 2021, Plaintiff and Defendant held mediation before Honorable
   Magistrate Judge Carol Sandra Moore Wells.
- 2. Defendant and Plaintiff discussed with Judge Wells issues pertaining to the structure of a potential settlement.
- 3. For settlement purposes, the parties are in general agreement as to the overall structure of potential a fund which would provide compensation to a settlement class.
- 5. The parties are still negotiating the value of the fund and associated attorneys' fees.
- 6. The parties request a continuance of the filing deadlines in this action to allow the parties to continue negotiating in good faith.
- 7. The parties believe alleviating the need to respond to dispositive motions and/or class certification briefs will allow the parties to focus solely on the settlement of this matter and avoid unnecessary expenditures and fees that might otherwise hinder settlement.
- 8. The parties believe that the requested time is sufficient to complete the settlement negotiations and expect to file any settlement papers no later than thirty (30) days of the date of this Motion.

9. If the parties are unable to file settlement papers within thirty (30) days of the date of this Motion, the parties will file a status update with the Court and agree that the continuance of all deadlines will be lifted at that time.

WHEREFORE, Plaintiff and Defendant respectfully request this Court stay all existing deadlines for 30 days.

Respectfully submitted,

## DATED: December 13, 2021

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